



PLANNING STATEMENT

On Behalf of:

Manor Oak Homes

In Respect of:

Outline application for up to 400 dwellings, land for a new primary school, open space, drainage, footpath improvements and vehicular access with all matters reserved other than access

Proposed at:

Land between Hookhams Lane and Ravensden Road, Salph End, Bedford

Date:

August 2019

Reference:

02517/S0001am

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Appendix 1: Public Consultation Leaflet, distributed throughout Salph End – September 2019

1.0 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Manor Oak Homes (the 'applicant') in support of an outline planning application for the development of land between Hookhams Land and Ravensden Road, Salph End, Bedford (the 'application site') with all matters reserved other than access.
- 1.2 This application seeks to deliver a landscape-led residential development of up to 400 dwellings (following the demolition of the existing dwelling on site at 25 Hookhams Lane), including provision for a mix of dwelling types of which 30% would be affordable housing, land for a new primary school, new vehicular access from both Hookhams Lane and Ravensden Road, enhanced footpath connections across the site and the provision of a range of open space ('the application scheme').
- 1.3 This submission presents a compelling opportunity for Officers to secure a major sustainable residential development that would bolster the Borough's currently deficient housing supply. At the same time, this submission also serves to absolutely confirm the deliverability of a site that since 2017 has been promoted extensively towards the emerging Bedford Local Plan 2030, a document that remains at examination.
- 1.4 The application is supported by the following documents, which together exceed the Council's validation requirements set out in the Officer response to the initial pre-application enquiry:
- Planning Statement, prepared by Armstrong Rigg Planning;
 - Parameters Plan, prepared by RG+P Architects;
 - Design & Access Statement, prepared by RG+P Architects;
 - Flood Risk Assessment (including Drainage Strategy), prepared by MAC Consulting;
 - Noise Assessment, prepared by Professional Consulting;
 - Heritage Assessment, prepared by Asset Heritage;
 - Archaeological Desk Based Assessment, prepared by MOLA;
 - Ecology Report (Extended Phase 1), prepared by Aspect Ecology;
 - Landscape and Visual Impact Assessment, prepared by Aspect Landscape Planning;
 - Transport Assessment, prepared by MAC Consulting;
 - Residential Travel Plan, prepared by MAC Consulting;
 - Tree Survey, prepared by Aspect Arboriculture;
 - Ground Investigation Report, prepared by Geo-Environmental;
 - Air Quality Assessment, prepared by Redmore Environmental;
 - Health Impact Assessment, prepared by Armstrong Rigg Planning;
 - Incoming Services Appraisal, prepared by MAC Consulting;
 - Topographical Survey, prepared by MSURV; and
 - CIL Forms.

Justification for the Release of the Site Now

- 1.5 This planning application represents the applicant's positive and much needed response to the currently critical housing supply issues faced by the Borough. Currently the Borough's housing land supply is only marginally over 3 years (3.01 years to be precise). Of as much relevance there is compelling evidence to suggest that delivery beyond the immediate 5-year period, through years 6-10 of the emerging Local Plan, will similarly fall well short of the number of homes required to meet what by that stage will inevitably be an overwhelming housing need in the Borough.
- 1.6 Asides from the deficient housing need position of the Borough the decision to submit the planning application has been taken for the following sound planning reasons:
- 1. The evidence-based work undertaken by the Council in support of the emerging Local Plan shows the application site to be an appropriate and sustainable location for growth subject to satisfying a limited number of constraints;**
 - 2. Detailed technical work undertaken on behalf of the applicants and submitted both throughout the promotion of the site towards the Local Plan and as part of this application shows that the constraints identified in the evidence base can be overcome, and any adverse impacts satisfactorily mitigated;**
 - 3. The application scheme represents an entirely self-contained development that, unlike many of the other larger sites promoted across the Borough, is not reliant on the provision of any additional off-site infrastructure to enable its delivery and can viably provide the supporting infrastructure – namely a new primary school site – to ensure it represents sustainable development in every respect;**
 - 4. Focussing development on the edge of the Bedford urban area represents an entirely sustainable and indeed the preferred approach to development due to the access offered to a full range of accompanying social and physical infrastructure;**
 - 5. There is an immediate and pressing need for new homes in the Borough capable of being delivered within the next five years and paragraph 11 of the NPPF is therefore engaged. There is therefore no prematurity argument.**
 - 6. An updated plan is needed immediately to "*secure levels of growth that accord with government policy and any growth deals that have been agreed*" - the Council's current strategy is simply ducking the looming issue of the significant numbers of new homes that are actually required across the Borough.**

- 7. The current trajectory is challenging, and a pipeline of deliverable large sites must be identified now, either through the Local Plan or development management process, that ensure consistent delivery into the 6-10 and 11-15 year periods. As it is an edge of urban location there is a strong expectation that the application site will come forward soon anyway as the evidence base of the emerging Local Plan demonstrates that there are no other alternative better sequentially performing sites.**

- 8. The entirety of the application site is under the control of the applicant and therefore there are no land ownership issues or legal obstacles to delivery. It therefore represents a suitable, available, achievable and therefore deliverable source of housing land that can start delivering much needed new housing in the short term in response to local identified needs, and then well into the emerging Local Plan period.**

Background to the Planning Application

Local Plan Promotion

- 1.7 The land subject of this application has been promoted continuously and extensively towards the emerging Bedford Local Plan 2030 by the applicant who has made a consistently strong case demonstrating its availability, achievability and overall suitability for development.

- 1.8 The promotion timeline of the site by Manor Oak Homes towards the emerging Local Plan 2030 can be summarised as follows:
 - **June 2017:** The applicant's first detailed written submission as part of the Local Plan promotion was in response to the April 2017 'Consultation Paper' which identified the site, along with additional land to the south of Salph End, as one of the Council's preferred allocations comprising an 'Urban Extension' capable of delivering approximately 500 dwellings and a new school.

The proposed allocation of the application site reflected the Council's preferred spatial strategy and distribution of growth that has been retained as part of the Examination Draft of the Plan. This confirms that sites on the edge of the Bedford urban area are amongst the most sustainable locations for additional growth in the Borough, second only to the delivery of sites within the town itself.

The proposed allocation also reflected the site's overwhelmingly positive review within the Council's Site Selection document which, as of June 2017, concluded that it was devoid of any constraints that would hinder its delivery. This conclusion followed a four-stage review that comprised an initial

appraisal; a more detailed review of suitability and availability; a more technical assessment of deliverability and viability; and finally, consideration as to whether the site met the objectives of the Plan.

- **March 2018:** The applicant submitted a further detailed representation towards the first Regulation 19 Pre-Submission Draft of the Plan which included a full suite of technical information reaffirming the deliverability of the site. This submission followed the removal of the application site as an allocation from the Plan partially on the grounds of one site specific issue only, what the applicant understands to relate to a response from the Parish Council in relation to the coalescence of Salph End with the Bedford urban area.

In response, the applicant's submission raised detailed concerns around the robustness and transparency of the Council's reasoning resulting in the deletion of the site as a preferred allocation considering the comprehensive and positive review of the site within the Site Selection document. It also includes a number of clear concerns in respect of the deliverability of a variety of the draft Plan's key sites and an over-burdening of the rural area with new homes.

- **October 2018:** Following significant alterations to the Local Plan following clear issues with the Council's preferred housing delivery strategy (namely the deletion of the Colworth village allocation) additional representations were made reaffirming the availability and suitability of the application site to deliver a significant contribution towards the Borough's housing land supply. The applicant also used this submission to restate their pressing concerns around the effectiveness of the Council's housing strategy; and
- **May / June 2019:** Following the series of submissions described above the applicant then played a full role at the Examination in Public of the Plan, during which the flaws in the Council's housing strategy were discussed in detail with the Inspectors and other interested parties. These remaining concerns included the Plan's over-reliance on neighbourhood plan-facilitated rural sites and the paucity of evidence demonstrating the deliverability of some of the large urban sites.

The Inspectors demonstrated clear concerns about the Council's approach to housing delivery during the course of the hearings, particularly in respect of the way that the Plan effectively dodges the issue of meeting imminent significant additional housing need as a result of the objectives of the Oxford-Cambridge Arc. It appears that, rather than requiring main modifications to the spatial strategy at this stage, the Inspectors have resolved to include a new policy that requires the immediate review of the Local Plan with submission for examination required within 3-years of adoption.

The need for this policy less suggests that all other elements of the Plan are robust and instead suggests that the Inspectors have acted in a "*pragmatic*" fashion on the instruction of the Secretary of State, as described in his letter to the Planning Inspectorate dated 18th June 2019¹. Indeed, the sole intent of this policy appears to be to ensure that the shortcomings of the current draft Plan are resolved quickly as part of the comprehensive reconsideration of the document in its entirety.

- 1.9 It remains the strong concern of the applicant that, whilst the eventual position reached by the Inspectors aims to remedy doubts around the deliverability of large elements of the Council's housing strategy, the required Plan review will take a minimum of 3 years. In which case there is a strong likelihood that this delay in putting a robust plan in place will precipitate a deficit in housing supply within the next 5-years unless a series of additional deliverable sites are identified and enabled now through the development management process.
- 1.10 On this basis the Council must respond positively to sustainable strategic opportunities such as the application scheme to ensure opportunities for consistent and sustainable growth can be secured that will bolster the Borough's supply beyond 2024/25. The detailed information submitted in support of this application, including the way in which it fully addresses the issue of coalescence, confirms that there are clear sound planning reasons why it should be approved now. This will enable one of the few well-performing sites in the Borough to deliver a substantial number of new homes that will contribute towards both the Council's immediate 5-year housing land supply and will continue to deliver throughout the Local Plan period until 2030.

Pre-Application Engagement

- 1.11 Due to the applicant's extensive level of engagement with the Local Plan process to date they have been able to gain a clear understanding of all of the site's constraints as well as the most efficient and effective way to ensure that the site helps meet the development needs of the Borough. Similarly, the fully involved nature of the promotion of the site towards the Local Plan has enabled a significant amount of feedback on the site and its development potential to be received from Officers, stakeholders and residents alike.
- 1.12 Irrespective of the level of publicity secured by way of the Local Plan promotion the applicant can confirm that a light-touch process of pre-application publicity has been undertaken around the village of Salph End in the form of a leaflet drop. A copy of the publicity leaflet is included at **Appendix 1** of this Statement.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/813180/Local_Plan_examinations_letter_to_the_Chief_Executive_of_the_Planning_Inspectorate.pdf

Scope of this Statement

- 1.13 This Statement should be read alongside the Design and Access Statement, prepared by RG+P, that provides a full explanation of the way in which the scheme responds to the constraints of the site and relevant design policy and guidance.
- 1.14 In full, this Statement: describes the application site and any relevant planning history in **Section 2**; describes the application scheme in **Section 3**; reviews relevant planning policy, both local and national, in **Section 4**; establishes the principle of development along with addressing all other planning considerations relating to the application scheme in **Section 5**, concluding with the planning balance; and sets out a clear conclusion in demonstrating the acceptability of the proposal in all regards in **Section 6**.

2.0 SITE DESCRIPTION & PLANNING HISTORY

The Site and Surrounding Area

- 2.1 The application site, the location of which is shown on **Plan 1** below, extends to 19.65ha and is situated to the north east of the Bedford urban area and adjacent to the village of Salph End. The site can be accessed from Hookhams Lane which acts as a spine road through the village, connecting it to the Bedford urban area and wider network of rural villages beyond.
- 2.2 The site comprises two agricultural fields and a bungalow at No.25 Hookhams Lane which fronts on to the road. It adjoins a children's nursey and area of woodland to the north, Ravensden Road and properties fronting this road to the east, properties on Home Close and Hookhams Lane to southeast, an enclosed area of rough grassland to the south and Mowsbury Golf Course to the west. There are trees and hedgerows along the site's boundaries and internal field boundaries. A tributary of Renhold Brook runs north-south through the site and forms the boundary between the two fields.



Plan 1: Location of Application site

- 2.3 Beyond the boundaries of the site, to the immediate east and south east, lies the developed area of Salph

End. The more substantial Bedford urban area then lies beyond the playing fields of Mark Rutherford School to the south of the site and beyond the golf club and Mowsbury Park to the west. The site therefore lies in a largely suburban context, albeit it enjoys a level of physical separation that will likely endure in perpetuity due to much of the immediately adjacent land comprising various types of important community open space.

- 2.4 The main environmental constraints on site comprises a strip of land prone to surface water flooding that flanks either side of the stream running across the site and a number of TPOs around the periphery of the site, principally on the northern and south east boundaries. The southern extent of the site also lies around 40m to the north of a corridor of land along Renhold Brook that lies in the Environment Agency's Flood Zones 2 and 3, albeit this does not impinge on the site itself. Importantly the site abuts the settlement boundary of Salph End and lies only 80m from the built-up area boundary of Bedford itself.
- 2.5 In terms of off-site constraints there are also two listed buildings within its immediate vicinity, once again to its south east. These are considered in detail within the accompanying Heritage Statement prepared by Asset Heritage.

Access

- 2.6 Vehicular access to the site is currently via a field gate on the southern side of Ravensden Road. A pedestrian link also exists from the southern corner of the site to Hookhams Lane via a combination of a public footpath and bridleway.
- 2.7 Both Ravensden Road and Hookhams Lane are subject to a 30mph speed limit. Ravensden Road is bound by a single 1.2m wide footway on its northern side which leads into Salph End to the east whilst Hookhams Lane is bound on both sides by 1.5m wide footways segregated from the road by grass verges. The footways along Hookhams provide pedestrian access to the local services within Salph End whilst linking the village to the Bedford urban area to the south.
- 2.8 There are no dedicated cycle facilities within the immediate vicinity of the site although both Ravensden Road and Hookhams Lane have wide carriageways which offer ample space for shared usage by cyclists and cars.
- 2.9 Walking and cycling distances from the site to key local services and facilities is illustrated by the Facilities Plan included at Appendix D of the accompanying Transport Assessment, prepared by MAC Consulting. It demonstrates that, taken from the point of the proposed new access onto Hookhams Lane, the site is: less than 50m from the village shop and post office; 75m from the nearest bus stop; 550m from the nearest public house; 950m from Putnoe Primary School (albeit the application scheme will provide a new

primary school site); and 950m from Mark Rutherford Secondary School and Sixth Form College.

Relevant Planning History and Current Planning Status of the Site

- 2.10 The application site is used for agricultural purposes and does not have any prior planning history of note. It is identified within both the adopted and emerging Bedford Local Plans as open countryside, albeit lying immediately adjacent to the settlement boundary of Salph End and within close proximity to the northernmost extent of the defined Bedford urban area.

3.0 THE PROPOSED DEVELOPMENT

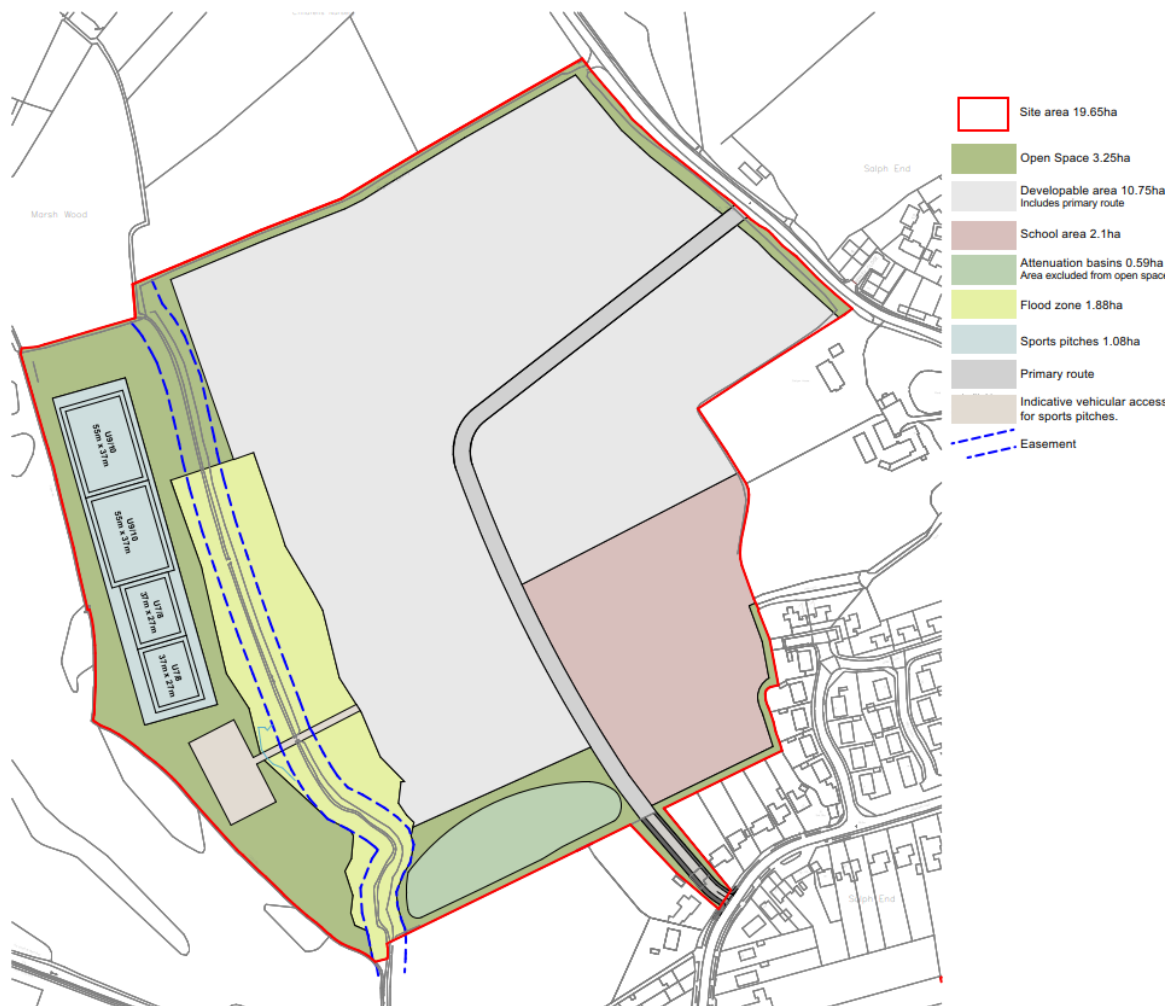
3.1 Whilst the application is in outline only, with all matters reserved other than access, a substantial amount of work has gone into the preparation of a detailed Parameters Plan to show how up to 400 dwellings can be delivered on site alongside land for a new primary school, open space and a scheme of surface drainage. The Parameters Plan (**Drawing No 40986 013D**) has been shaped by the recommendations of the technical work undertaken in support of this application and seeks to respond to the constraints of the site.

3.2 The key components of the Parameters Plan prepared by RG+P Architects, which can be seen at **Plan 2** below and is explained in detail in the Design and Access Statement, can be summarised as follows:

- A residential scheme of up to 400 dwellings at a density of approximately 20dph gross, approximately 35dph net, comprising a mix of homes ranging from 1-bedroom to 4-bedroom properties, of which 30% would be affordable housing. An indicative mix of both market and affordable dwellings is set out in the housing statement comprising part of our analysis in **Section 5** of this Statement with the final mix expected to be determined at reserved matters stage;
- A layout that is informed by the Council's 'Achieving Quality in Residential Layouts' Supplementary Planning Guidance as well as one which responds sensitively to on-site constraints and adjacent uses;
- Provision of a range of open spaces throughout the development, including formal areas of play, in line with the Council's 'Open Space' Supplementary Planning Document including a substantial linear area of informal open space through the centre of the site along the stream which is not included in the final open space calculations;
- A site for a new primary school, extending to 2.1ha, that will be well linked to the internal road network and providing appropriate parent drop off points and accessibility via public transport;
- Capacity for car and cycle parking to be provided in-line with Bedford Borough Council standards. The majority of the residential parking will be accommodated on-plot and off-street. In addition, adequate parking can also be provided to serve the school site;
- A principal spine road formed by two separate access points, the first via the plot of the existing property at No.25 Hookhams Lane and the second connecting with Ravensden Road. All principle internal routes will be designed to be built to adoptable standard with the ability to accommodate public transport services;
- Upgrades to the public rights of way along the northern and southern boundaries of the site as well as additional footpath and cycle links throughout the development;
- Retention and/or appropriate replacement and enhancement of existing habitats and boundary planting/trees as well as habitat enhancements elsewhere within the site;
- The provision of a linear publicly accessible wildlife corridor leading north to south through the site and following the line of the existing stream. Additionally, the retention of this space ensures that

there is no proposed development in the areas of the site most prone to surface water flooding whilst accommodating the 9m easement required by the Lead Local Flood Authority; and

- A scheme of drainage and flood attenuation designed to not only manage the run-off from the new development but also existing instances of surface water flooding along the banks of the stream crossing the site. The scheme of drainage has been designed to achieve green field run-off rates.



Plan 2: Extract from Illustrative Parameters Plan

3.3 Being on the northern edge of the Bedford urban area the site is extremely well placed to deliver an important new residential development that would contribute significantly towards meeting both local housing needs as well as local community requirements through the provision of generous areas of formal and informal open space and land for a new primary school.

3.4 The application scheme would be delivered in a manner that has regard to, and responds positively to, existing site constraints. In particular it is designed to ensure that there is no coalescence, either physical or perceived, of Salph End and the Bedford urban area through the provision of the majority of the open space on the western edge of the site.

3.5 The application scheme allows for a mix of dwelling types, sizes and tenures reflective of Bedford's Strategic Housing Market Assessment (SHMA)² that would make an important contribution towards meeting the specific housing needs of the Borough. Importantly it includes an affordable element of 30% of all dwellings, helping contribute to the significant need for affordable housing locally, a matter that was subject to lengthy discussions at the recent Local Plan Examination. This, together with the delivery of other benefits referred to later in this Statement and the location of the proposal adjacent to the Bedford urban area, amount to a demonstrably sustainable development justifying the compliance of the scheme in line with the Council's adopted and emerging spatial strategies and the National Planning Policy Framework (NPPF) read as a whole.

² Report of Findings and Addendum Report (August 2018)

<https://edrms.bedford.gov.uk/OpenDocument.aspx?id=K61Ylr6t9PViyEkjeoiA%2fw%3d%3d&name=01%20-%20Strategic%20Housing%20Market%20Assessment%20with%20Addendum.pdf>

4.0 PLANNING POLICY REVIEW

Planning Policy Overview

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, the starting point for decision making, unless material considerations indicate otherwise. One material consideration of weight is the policies of the NPPF, a document that provides the framework against which development plan policies should firstly be produced and then maintained and one which seeks to guide the approach taken by the decision maker when determining planning applications.
- 4.2 For the purposes of Section 38(6) of the Act the development plan relevant to the consideration of the Site comprises the saved policies of the Bedford Local Plan, adopted in 2002, the Core Strategy and Rural Issues Plan (CSRIP), adopted in 2008, and the Allocations and Designations Local Plan (ADLP) adopted in 2013.
- 4.3 The policies of the emerging Local Plan 2030 are also of relevance following its submission to the Secretary of State for examination on 22nd January 2019, albeit the level of weight to be attributed to them must be tempered by the guidance included at paragraph 48 of the Framework. It is clear from the responses to the post-examination consultation on a proposed draft review policy that significant objection continues to exist in relation to both the plan's spatial strategy and the proposed contingency to undertake an 'early review' of the document. These matters will clearly need to be legislated by the Inspectors before any significant weight can be given to its policies.

National Planning Policy

- 4.4 National planning policy is provided for by the National Planning Policy Framework (NPPF), published on 19th February 2019, with further illustration included within the Planning Practice Guidance (PPG) suite which was first launched on the 6th March 2014.
- 4.5 The Framework exemplifies the Government's push towards efficiency in the planning system and embodies a pro-development stance. At the core of the Framework is a presumption in favour of sustainable development - therefore, in preparing plans, local planning authorities (LPAs) should positively seek opportunities to meet the development needs of the area. In taking decisions, it means approving development proposals that accord with an up-to-date development plan without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, LPAs should grant permission unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the

Framework as a whole.

4.6 In order to foster the delivery of sustainable development, LPAs are encouraged to approach decision-taking in a positive way (paragraph 38 of the Framework). A creative approach to the consideration of planning applications should be applied and decision-takers at every level should seek to approve applications for sustainable development where possible through working proactively with applicants to secure developments which improve the economic, social and environmental conditions of an area.

4.7 Of particular relevance to this application are the following sections of the NPPF:

- Section 2: Achieving sustainable development
- Section 4: Decision taking
- Section 5: Delivering a sufficient supply of homes
- Section 8: Promoting healthy and safe communities
- Section 9: Promoting sustainable transport
- Section 11: Making effective use of land
- Section 12: Achieving well-designed places
- Section 14: Meeting the challenge of climate change, flooding and coastal change
- Section 15: Conserving and enhancing the natural environment
- Annex 1 - Implementation

The Development Plan

Bedford Local Plan 2002 (Saved Policies)

4.8 The Bedford Local Plan was adopted in October 1997 with a number of policies 'saved' in September 2007. A number of these saved policies have since been replaced in their entirety by those set out in the adopted CSRIP and ADLP. The remainder will be replaced in due course by the policies of the emerging Local Plan 2030. The following policies are relevant for the purposes of this application:

- **Policy NE4 Trees and Hedges**

- **Policy NE 6 Woodland**

- The Council will seek to preserve trees and hedgerows that it considers to be of amenity, landscape or wildlife significance.

- **Policy NE10 Contributions to Nature Conservation**

- Where appropriate development will be expected to contribute towards nature conservation through measures which will include the creation of new habitats.

- **Policy NE11 Access to the Countryside and Interpretation Facilities**

In appropriate cases the Borough Council will seek opportunities to increase access to the countryside.

- **Policy NE12 Landscaping in Association with Development**

- **Policy NE13 Landscape Management and Protection**

Development proposals should seek to retain important landscape features on site and include a scheme of landscaping in line with the Borough's landscape design guidance.

- **Policy NE16 Flooding**

Development proposals will not be permitted in instances where they increase the risk of flooding.

- **Policy NE18 Character of Built Areas**

Development will only be permitted where it does not affect the built character of either villages or the urban area and will not result in the adverse loss of open space or wildlife habitats.

- **Policy BE3 Uses and Infrastructure to Promote Self-Sustaining Communities**

Major new housing development will be required to incorporate the necessary uses and infrastructure to enable the establishment of more self-sustaining communities. This will normally include: provision of a mix and range of house types; supporting employment and community facilities; access to a range of modes of sustainable transport; and adequate provision for outdoor recreation.

- **Policy BE21 Setting of Listed Buildings**

The Council will seek to preserve and enhance the setting of listed buildings.

- **Policy BE24 Archaeology**

The Council will have regard to the need to protect, enhance and preserve sites of archaeological interest and their settings. Where appropriate the archaeological aspects of development proposals should be examined and evaluated before a planning application is determined.

- **Policy BE29 High Standard of Design**

All new development should be designed to the highest standards. This should be informed by any relevant design guidance published by the Council.

- **Policy BE30 Material Considerations in the Control of New Development**

When determining applications the Council will have full regard to: the visual impact of the development, considering the site's context and relationship with its surroundings; design matters including scale, density and layout; the quality of public spaces; traffic impact; provision of access to

sustainable modes of transport; the levels of access afforded to the proposed to all sections of the community; amenity impacts caused by noise or smell; any adverse effects on the natural environment or built heritage; and the adequacy of existing infrastructure.

- **Policy BE31 Statement of Design Principles**

Planning applications should be accompanied by a statement describing the design principles of the proposal.

- **Policy BE32 Development on the Edge of Urban Areas and Villages**

Where new development is proposed on the edge of urban areas or villages it should minimise the impact on surrounding land.

- **Policy BE35 Achieving Quality in Residential Layouts**

The Council will expect quality design in residential layouts with attention paid to matters which include: local distinctiveness; design based on a detailed site analysis; impact of development on the wider landscape; site capacities based on a net developable area; and provision for a range of dwellings sizes.

- **Policy BE38 Landscaping**

Development proposals will be expected to comprise sufficient on-site landscaping to ensure the scheme is beneficial in landscape and environmental terms.

- **Policy H26 Housing in the Open Countryside**

Housing will not be permitted in the open countryside except in special circumstances including agricultural workers dwellings and replacement dwellings.

- **Policy T4 Reducing Highway Impact**

New roads should be subject of landscape screening and mitigation to ensure that noise impact on existing amenity is reduced to acceptable levels.

- **Policy T6 Public Transport Infrastructure**

The Council will support development that makes provision for new public transport infrastructure.

- **Policy T15 Parking**

New development proposals will include a level of parking provision in line with the Council's parking standards.

- **Policy LR10 Access to the Countryside**

In determining planning applications, the Council will seek to retain existing rights of way whilst seeking opportunities to enhance the local footpath and cycle path network and the level of access afforded to the countryside.

Core Strategy and Rural Issues Plan (April 2008)

4.9 The CSRIP was adopted in April 2008 and currently comprises the strategic policies of the development plan. Those relevant to the application scheme are as follows:

- **Policy CP2 Sustainable Development Principles**

The development and reuse of land will seek to ensure that amongst other objectives: resources and infrastructure are utilised efficiently; biodiversity is protected; climate change, renewable energy and drainage issues are properly addressed; buildings and spaces promote existing townscapes; the character of the local landscape is preserved; the use of the private car is minimised; and opportunities for outdoor recreation are readily available.

- **Policy CP3 The Location of Development in the Growth Area**

The locations of growth will principally be within the defined urban area and sustainable settlements.

- **Policy CP5 Sequential Approach to the Allocation of Land for Residential and Employment Development in the Growth Area**

Development sites to be identified in the ADLP (since adopted) are to be allocated based on a hierarchy of sustainability with the approach in respect of residential development favouring the following sequence: firstly, previously developed land within the growth area and most sustainable villages; secondly, urban extensions on the edge of the growth area; and thirdly, extension to sustainable villages.

- **Policy CP7 Meeting Housing Needs**

Residential development sites will be expected to provide a mix of dwellings to meet the identified needs of the community.

- **Policy CP8 Affordable Housing in the Borough**

Sites of a size capable of delivering affordable housing should include a 30% element of dwellings as affordable in tenure.

- **Policy CP13 The Countryside and Development Within It**

All land outside settlement policy areas is classified as open countryside. Development will only be

permitted in these locations if it is consistent with national policy.

- **Policy CP14 Location of Development within the Rural Policy Area**

Where there is a proven need for development to come forward in the rural policy area it will be focused in and around the edge of key service centres where homes, services and jobs can be located closest together.

- **Policy CP21 Designing in Quality**

All new development should be of the highest quality in respect of: architecture and landscape design; good practice in urban design; appreciation of its context and setting; levels of accessibility and crime prevention; and appreciation of sustainable design.

- **Policy CP23 Heritage**

Development will be expected to protect and, where possible, enhance heritage assets and their setting. This includes a duty to protect the Borough's cultural assets including its landscape.

- **Policy CP24 Landscape Protection and Enhancement**

New development should protect and where appropriate enhance the quality and character of the landscape. The nature and scale of development should be appropriate within the wider landscape.

- **Policy CP25 Biodiversity**

New development will ensure that biodiversity and geodiversity and in particular priority habitats, species and geodiversity features, will be protected and where appropriate enhanced.

- **Policy CP30 Developer Contributions**

Where implementation of a development would individually or cumulatively create a need to provide additional or improved infrastructure, amenities or facilities, or would exacerbate an existing deficiency in their provision, the developer will be expected to make or contribute towards such provision by means of planning condition or legal obligation.

Allocations and Designations Local Plan (2013)

4.10 The ADLP primarily sets out the Council's strategic allocations in line with the development strategy included in the CSRIP. It does, however, also include a limited number of development management policies of relevance to this application. These include:

- **Policy AD24 Green Infrastructure Opportunity Zones**

This policy identifies the site as lying within one of six zones across the Borough, specifically the

'Bedford Northern Fringes' zone where opportunities to enhance the GI across the Borough should be taken where appropriate. In respect of the Bedford Northern Fringes zone the policy identifies opportunities to enhance the existing public open spaces, improve the interpretation of historic environment features such as the hillfort and moat on Mowsbury Hill, and to create walking, cycling and horse-riding routes linking villages to the north of Bedford with the northern section of the Bedford Green Wheel.

- **Policy AD28 Provision of Open Space and Built Facilities in Association with New Development**

Where new housing development is of a type likely to create a demand, the Council will require provision of open space and built facilities in accordance with its most up to date open space standards. Where possible this should be delivered on site, although contributions in lieu of on-site provision may be acceptable.

- **Policy AD36 Pedestrian Routes**

The Council will require the protection, enhancement and promotion of pedestrian routes and facilities. The Council will seek the provision of new pedestrian routes and facilities which are safe, convenient, attractive, and which link local facilities, particularly in association with major development and transportation proposals.

- **Policy AD39 Cycling**

The Council will require the protection, enhancement and promotion of cycle routes and facilities and seek the provision of new routes and facilities for cyclists which are safe, convenient and attractive, particularly in association with major development and transportation proposals.

Supplementary Planning Documents

4.11 The following Supplementary Planning Documents (SPD) are material when considering the application scheme:

- **Achieving Quality in Residential Layouts (September 1997):** This document sets out an overview of the expected approach to the delivery of well-designed development in Bedford Borough. Whilst much of it is indicative it provides detailed advice in respect of the way that development should reflect local character, achieve attractive streetscapes, ensure high levels of amenity for existing and future residents and subtly integrate the built form of new development with complementary landscaping.
- **Planning Obligations (July 2013):** This document sets out the procedures for securing

infrastructure contributions from developments by way of the S106 process. It similarly explains the relationship of this process with the Community Infrastructure Levy (CIL).

- **Open Space (September 2013):** This document includes a formula-based approach to the provision of open space as part of development proposals in line with Policy AD28 of the ADLP.
- **Parking Standards for Sustainable Communities (September 2014):** This sets out the expected car and cycle parking standards for all new residential development. It presents a requirement of 1 space for every 1-bedroom dwelling, 2 spaces for 2 and 3-bedroom dwellings and 3 spaces for 4-bedroom dwellings or larger. In addition, 0.4 unallocated spaces should be provided per dwellings.

Community Infrastructure Levy

4.12 The Council's CIL took effect on 1st April 2014 and applies to all liable development that receives planning permission beyond this date. In respect of new qualifying development in 'Area 3' a £100 per sqm charge applies, index-linked to 2019 prices.

Emerging Local Plan

4.13 The Bedford Local Plan 2030 was submitted to the Secretary of State for examination in January 2019. The initial programme of hearings has now been completed and currently consultation is taking place on proposed Main Modifications. Due to the transitional arrangements set out in the current NPPF it is currently in the process of being examined against the policies of the old framework. It is anticipated that the examination will conclude at some point during Autumn 2019, although there are still a number of outstanding and unresolved objections to the plan particularly in respect of a proposed review policy and the fundamental way in which the plan seeks to approach housing delivery. On this basis the eventual outcome of the examination is unknown.

4.14 Currently, and on review of the papers presented to the Council's August 2019 Planning Committee, we understand that Officers are only applying limited weight to the policies of the emerging Local Plan.

4.15 The emerging Local Plan 2030 seeks to retain the sequential approach in respect of the direction of future growth described by Policy CP5 of the adopted CSRIP – that is an urban first approach to development, favouring the reuse of previously developed land in the urban area as a priority and then identifying suitable sites on the edge of Bedford as the next most sustainable option.

4.16 The most critical draft policy for inclusion in the emerging Local Plan 2030 is one which makes it binding

on the Council to undertake what will effectively be an immediate review of the document with the objective of submitting a replacement document to the Secretary of State within three years of the date of adoption. This is in light of a clear recognition by both the Council and the presiding Inspectors that currently the draft plan provides an insufficient framework to plan for the levels of growth anticipated in the Borough from now onwards. In the event that the replacement plan is not submitted by this time the policies which are most important for determining planning applications for new dwellings will be deemed out of date.

- 4.17 The full wording of the proposed review policy, included as a Main Modification and subject of further consultation until 1st October 2019, is as follows:

“Policy XX Reviewing the Local Plan 2030

The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019.

The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway, Black Cat junction, East West Rail link and potentially the A1 realignment.

The review will also serve to build stronger working relationships with adjoining and nearby authorities and may result in the preparation of a joint strategic plan based on a wider geography. [MM1]”

- 4.18 The other draft policies of note are as follows:

- **Policy 2S Spatial Strategy**

This describes the core principles of the emerging plan which include the focus of the majority of new development on the Bedford urban area, supplemented by strategic scale rural growth predominantly delivered by neighbourhood plans.

- **Policy 3S Amount and Distribution of Housing Development**

This policy sets out the levels of growth proposed at each tier of the settlement hierarchy. Specific to this application it identifies 'Urban Extensions' as the second highest tier, below the urban area itself, whilst only directing a minimal 210 of the 3,169 dwellings to be delivered by the plan towards sites on the edge of the urban area.

- **Policy 6S Development in the Countryside**

The plan proposes that new development may come forward on sites well related to the settlement policy area of towns and villages in the instance that it meets all of a number of criteria. Predominantly this policy seeks to manage the delivery of small-scale development on the edge of villages.

4.19 Otherwise the emerging plan contains a full suite of development management policies that, between them, reflect the NPPF's drive towards securing development that is sustainable in every respect. Specific to new residential developments the emerging plan seeks a mix of dwellings to meet local needs and a 30% level of affordable housing on all qualifying sites – in the rural area this includes all sites of 3 or more homes in villages of fewer than 3,000 population. To this end the direction of the plan's development strategy remains unchanged from the current adopted development plan when read as a whole.

5.0 PLANNING ANALYSIS

- 5.1 The documentation submitted in support of this application demonstrates that the proposal offers a high-quality landscape-led scheme that sees the efficient use of available and suitable land with a view to delivering a vital supply of new homes in the Borough both over the following 5-years and then further into the period of the emerging Local Plan.
- 5.2 The site is in an accessible location which forms a natural and complementary extension to the existing village of Salph End whilst offering an excellent level of access to the Bedford urban area, both through its close proximity to the northern edge of the town and ability to support much enhanced public transport services from the village to the centre of Bedford. Through mitigation against, and therefore avoidance of, the single key concern raised by Officers in relation to the site during the development of the emerging Local Plan – coalescence – the scheme meets the key components of sustainable development and would respect the character and amenities of the natural and built environment.
- 5.3 Development of this site as proposed would assist in bringing forward much needed new housing, including affordable housing, in the context of a currently dated adopted Local Plan and an emerging replacement strategy that will be subject to immediate review, predominantly due to the immediate demand for a significant increase in housing delivery above and beyond the 970 dwellings per annum (dpa) required as a result of the Council's SHMA. This would make a direct and positive response to the Government's ambition for securing a boost in the delivery of housing to address serious problems of affordability and supply.
- 5.4 The issues raised by the proposals, and which are considered in turn below, comprise the following:
- **Principle of Development**
 - **Layout and Design**
 - **Landscape**
 - **Ecology**
 - **Trees**
 - **Heritage**
 - **Archaeology**
 - **Housing Mix**
 - **Open Space Provision**
 - **Highways and Access**
 - **Air Quality**
 - **Noise**
 - **Flooding and Drainage**
 - **Utilities**
 - **Ground Conditions**

Principle of Development

- 5.5 The firm basis that establishes the principle of the application scheme is formed by the sustainable location of the site, the ability of the development to deliver a significant number of new homes to bolster

a demonstrably deficient level of housing supply within the Borough and the clear need to ensure that a pipeline of new homes can be provided beyond the immediate 5-year period. This application seeks to respond directly to the Government's twin principle objectives of achieving sustainable development and significantly boosting the supply of new homes, both of which are made plain throughout the policies of the NPPF.

Site Location

- 5.6 The application site is located adjacent to the settlement envelope of the village of Salph End and, more importantly, only 0.25km from the northern edge of the Bedford urban area. It is in a sustainable location well served by local shops, services and community facilities and one that is well related to primary transport routes, public transport services and the local footpath and cycle path network.
- 5.7 In establishing the Council's preferred approach to growth, the spatial strategy which underpins the adopted CSRIP identifies that *"the areas of Bedford, Kempston and the northern Marston Vale (comprising the Growth Area) are the focus for development"*. This approach establishes the Bedford urban area as the main hub for new development in the Borough.
- 5.8 Policy CP5 of the CSRIP then goes on to explain the sequential approach that the Council sought to adopt in identifying additional sites to meet the needs of the Borough in the since-published Site Allocations Plan. Whilst this policy principally set out a framework for future allocations, now identified and adopted, it continues to serve an additional purpose - as creating a hierarchy which ranks the most sustainable locations for growth in the Borough. After previously developed land in the urban area Policy CP5 confirms the following as the second most sustainable location for new growth in the Borough:

"...urban extensions which are well related to the primary transport network and have or are capable of achieving good connections to the public transport and cycle network."

- 5.9 This ranking of the sustainability of broad growth locations has since been carried through into the emerging Local Plan 2030. Part of the evidence base of the emerging plan, the 'Development Strategy and Site Selection Methodology'³ paper published in September 2018, states the following:

"The urban area of Bedford / Kempston was recognised as the most sustainable location in the borough as it contains the greatest range of employment opportunities together with services, leisure, social and community facilities. Their concentration reduces the need to travel and, where travel is necessary, increases the likelihood of this being by walking or cycling. It also increases the viability of public transport. Beyond the urban area, taking

³ Development Strategy and Site Selection Methodology (September 2018)

<http://edrms.bedford.gov.uk/OpenDocument.aspx?id=Ea3Lv9fpToPhW6F4J3IZBQ%3d%3d&name=05%20-%20Development%20Strategy%20and%20Site%20Selection%20Methodology.pdf>

account of technical work on the settlement hierarchy, four levels of settlement were identified. Group 1 villages are those that contain a good range of services and are well connected to larger town centres by regular public transport. Six Group 1 villages were identified – Bromham, Clapham, Great Barford, Sharnbrook, Wilstead and Wootton. Group 2 and 3 villages have fewer facilities. Group 4 settlements have few or no facilities and, furthermore are made up of more loose knit development and therefore do not have a defined settlement policy area. Using this information would suggest that the first choice for allocating growth should be sustainable locations in and around the urban area."

(our emphasis)

- 5.10 Paragraph 6.7 of the draft plan goes on to confirm that *"the local plan's development strategy starts with an examination of the capacity of the urban area to absorb development and then consideration of land adjoining the urban area"*. This urban-first approach is then enshrined in draft Policy 3S which confirms urban extensions as sequentially preferable options for growth.
- 5.11 In respect of the specific merits of the application site and its ability to meet the growth objectives of the Council it is compelling that it has previously been considered positively during the preparation of the Local Plan 2030. Indeed, the 'Local Plan Consultation Paper'⁴ (essentially the Council's 'preferred options' document) published in April 2017 identified the site as a preferred allocation adjoining the urban area following a detailed assessment of its credentials in the 'Site Assessment and Potential Options for Allocation'⁵ technical paper (April 2017). This paper recognised that it is devoid of physical constraints, well-related to the urban area and both suitable and viable for a significant level of development.
- 5.12 Whilst the site was not included in the Regulation 19 Submission Draft of the Plan (March 2018) it appears that it was excluded on a single technical ground – the deemed coalescence of Salph End with the urban area. This follows a conclusion in the Site Assessment background paper, which informed the decisions made by the Local Plan Consultation Paper, that the development of the site would result in *"no landscape issues and the site does not impact on any key views"*. It is notable that this conclusion was reached by Officers despite a total lack of landscape evidence or any critical analysis of the physical characteristics of the site and its surroundings.
- 5.13 In the context of this application it is also critical to note that the landscape protections granted to Salph End at paragraph 15.12 of the adopted ADLP identify the risk of coalescence as solely relating to the closing of the narrow gap between the eastern edge of the village and development to the north of Norse Road. An extract of the ADLP is set below. Different to the extent of the land promoted towards the

⁴ Consultation Paper 2017

<https://edrms.bedford.gov.uk/OpenDocument.aspx?id=BdL5HHdCBUUTG8mijaYszg%3d%3d&name=Consultation%20Paper%20170411%20with%20cover.pdf>

⁵ Site Assessments and Potential Options for Allocation (full print version – April 2017)

<https://edrms.bedford.gov.uk/OpenDocument.aspx?id=40yHtEychIYhZAiipHSsvg%3d%3d&name=Site%20Assessments%20complete%20print%20version.pdf>

emerging Local Plan this application now relates exclusively to land on the western edge of the village.

Salph End – Bedford

15.12 Salph End immediately adjoins the urban area and extends northwards from it but separation needs to be maintained in relation to development on Norse Road (less than 600 m). Any development on the east side of Salph End is likely to reduce openness and contribute to visual coalescence with Bedford thus affecting the separate character and identity of Salph End.

- 5.14 This application is supported by an extensive suite of landscape and visual impact evidence, as well as a Parameter Plan which demonstrates how any identified landscape constraints have been considered. The findings of the landscape evidence are summarised in more detail later in this section.
- 5.15 Ultimately it is clear that the scheme presents no threat of either physical or perceived coalescence of Salph End with the Bedford urban area. As the single constraint identified by the Council during the site assessment process can therefore be entirely mitigated it should properly be concluded that, on a locational basis, the application site is entirely suitable and sustainable for residential development. It is accessible, well related to the Bedford urban area and would directly abut the settlement boundary of Salph End.

Housing Land Supply (5 years)

- 5.16 Importantly the Council cannot demonstrate a sufficient supply of new homes to meet the needs of the next 5-years, in accordance with the requirements of paragraph 73 of the NPPF. The Council's up-to-date housing land supply position acknowledges this⁶. When assessed against the Government's Local Housing Need (LHN) figure (1,345dpa), as is the requirement in instances where the strategic policies of the development plan are more than 5-years old, it can only demonstrate a **3.01-year supply**. This represents a drastic level of under-provision when assessed against the most up-to-date indication of housing need in the Borough.
- 5.17 The Council are continuing to progress the emerging Local Plan 2030 towards adoption, a document that if adopted would result in the demonstration of a housing land supply of approximately 5.67 years, albeit set against on a far lower SHMA-based figure of 970dpa. It is, however, clear from the July 2019 consultation on a proposed policy that will trigger an early review of the Plan that significant objections still exist in respect of the overall strategy. A number of respondents contend that the review policy is simply attempting to make an unsound plan sound in that it does nothing to rectify clear issues in respect

⁶ 5 Year Supply of Deliverable Housing Sites 2019/20 to 2023/24 (May 2019)

<https://bbcdevwebfiles.blob.core.windows.net/webfiles/Planning%20and%20Building/Planning%20Policy/May%202019%20deliverable%20sites%20report.pdf>

of the document's housing strategy including its unwillingness to acknowledge the actual number of homes required across the Borough.

- 5.18 Most recently the Council published its proposed Main Modifications to the Local Plan for consultation on Monday 19th August 2019. The review policy is retained continuing to commit the Council to commencing a review of the plan within a year of its adoption and its submission to the Secretary of State within 3-years of adoption. Tellingly the draft policy confirms that this will allow the updated plan to "*secure levels of growth that accord with government policy and any growth deals that have been agreed*", a clear recognition that the Council's current strategy is simply ducking the looming issue of the significant numbers of new homes that are actually required across the Borough.
- 5.19 Regardless, due to the weight of objection that continues to exist to the draft plan and the absence of any clarity from the Inspectors in respect of whether these objections have been overcome the weight to be attributed to the document in respect of housing strategy and delivery should be limited. Indeed, this position of uncertainty formed the basis for the Inspector's conclusions in respect of a recent appeal at Cople⁷ who confirmed:

"30. It is common ground that the Council does not have a five-year supply of deliverable housing. The Council accepts that there is a shortfall but submits that steps are being taken to address it. It is arguing that it has a good rate of delivery and an emerging plan, currently being examined, which is close to adoption. As such it submits that the lack of supply will be short lived. However, I have no substantive evidence on this issue and make no judgement on the outcome of the ongoing examination. Therefore, as it stands there is a need for housing in the borough."

(our emphasis)

- 5.20 On this basis it is clear that there is an immediate and pressing need for new homes in the Borough capable of being delivered within the next five years and paragraph 11 of the NPPF is therefore engaged.

Medium and Long-Term Housing Land Supply (6-10 and 11-15 years)

- 5.21 The greatest deficiency of the Council's current approach to growth, illustrated by draft Local Plan, is a reluctance or inability (or indeed both) to plan for the Borough's housing needs in the medium and longer term. Paragraph 22 of the NPPF is clear, that "*strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure*". The emerging Local Plan only seeks to provide a framework for growth until 2030 and, as acknowledged by the wording of the draft review policy, defers decisions relating to any uplift in growth as a result of the proposed Growth Deal in association with the Cambridge – Milton Keynes – Oxford Arc to a plan review.

⁷ Appeal Ref: 3216849 – Land at Bedford Road, Cople

- 5.22 Indeed, the draft review policy subject of the current Main Modifications consultation expects to see a replacement strategy submitted to the Secretary of State within three years of the adoption of the emerging plan. To this end when adopted the Local Plan 2030 will effectively provide a strategy for approximately 4 years to be superseded by a replacement document that will then expected to be fit for purpose in respect of delivering against medium to long term needs. Such short term thinking on the part of the Council inevitably stores problems in the medium to long term.
- 5.23 Currently the Council's housing trajectory⁸ included as part of the evidence base of the emerging Local Plan shows the anticipated housing delivery during each of the final four years of the plan period until 2030 as falling below the SHMA requirement of 970 dpa (890, 764, 527 and 465 homes during years 2026/27 through to 2029/30 respectively). As paragraph 73 of the NPPF requires the use of the Government's LHN figure when assessing housing land supply beyond the fifth anniversary of an adopted local plan the more appropriate figure to assess these figures against would be the 1,345dpa requirement resultant of the standard methodology. In which case the levels of delivery in each of the final four years of the plan (and indeed in monitoring year 2025/26 – 1,044 dwellings) fall significantly below the LHN requirement.
- 5.24 Even based on the SHMA figure of 970dpa the maintenance of a five-year supply throughout the plan period appears challenging. Upon the adoption of the plan paragraph 73 of the NPPF will then require the application of a minimum 5% buffer to the annual requirement when considering the Council's housing land supply *"to ensure choice and competition in the market for land"*. This results in a basic requirement for each five-year period of 5,093 dwellings and a minimum plan requirement (2015-2030) of 15,279 dwellings.
- 5.25 Currently the trajectory demonstrates the potential delivery of 15,552 dwellings over this period, only marginally exceeding the minimum 15,279 dwelling requirement, including the 5% buffer. If the Council's future housing delivery rate falls below 85% a 20% buffer must then be applied to the five-year requirement. If this were to happen there is no leeway at all to ensure a commensurate supply could be demonstrated, accounting for the 20% uplift, with the Council's housing land supply position likely to immediately lapse below five years.
- 5.26 Quite simply the Council has done nowhere near enough to ensure that sufficient levels of housing delivery can be maintained beyond the first five years of the plan period. It is abundantly clear that the current draft plan does nothing to provide confidence that the Council have responded positively to paragraph

⁸ Housing Trajectory Update May 2019

<http://edrms.bedford.gov.uk/OpenDocument.aspx?id=LAoXF%2bTD4!%2fGOu8vJWIZsA%3d%3d&name=ED16%20May%202019%20LP2030%20trajectory%20SD%2036%20update.pdf>

67 of the NPPF or indeed paragraph 47 of the NPPF 2012⁹ which both provide identical text requiring the identification of "*specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan*".

- 5.27 Simply deferring decisions in respect of housing delivery beyond the immediate five-year period to a replacement plan is an unsatisfactory response to the challenge of the NPPF. In fact, this refusal to put a longer-term strategy in place now will inevitably exacerbate issues in respect of delivery down the line – a pipeline of deliverable large sites must be identified now, either through the Local Plan or development management process, that ensure consistent delivery into the 6-10 and 11-15 year periods.

Delivery of the Application Site

- 5.28 On the basis of all of the above the application site represents a compelling opportunity to deliver a vital supply of new homes in the Borough within the first five years following the grant of outline planning permission and deep into the 6-10 year period thereafter.
- 5.29 Anticipating the positive and timely determination of this application we would anticipate the grant of outline planning consent by Winter 2019. Typical of the applicant's proactive approach to the delivery of sites under their control a reserved matters application would follow within 6 months ensuring that an implementable consent is secured by Summer / Autumn 2020. A development partner would be identified, and the sale of the site secured within approximately 3 months of consent with delivery of the site expected to begin in early 2021.
- 5.30 In terms of the achievability of the applicant's land beyond this point, including timescales and the way in which it may bolster the Council's trajectory, we have modelled delivery against the oft-cited 2016 Lichfields report 'Start to Finish'¹⁰ which identifies that following the grant of planning permission the average annual build out rate is 60 to 70 dwellings per year for sites of 100 to 1,000 dwellings. Building in a lead in of around a year to implement the necessary supporting infrastructure we would estimate first completions on site by mid-2022. Using the midpoint of 65 dwellings per year it is then likely that our client's site would be delivered in full by 2029. These rates of delivery would contribute 110 units to the Council's immediate 5-year supply and, perhaps more importantly, guarantee the delivery of at least 290 dwellings during the 6-10 year period.
- 5.31 The expected annual delivery from the application scheme, factoring in the time until the grant of planning permission (PP), the submission of a reserved matters application along with discharge of conditions (RM/DoC) and the sale of the site is set out in **Table 1** below:

⁹ Under the transitional arrangement set out in the NPPF the emerging Local Plan is being examined against the 2012 framework

¹⁰ Link to document: <http://lichfields.uk/media/1728/start-to-finish.pdf>

Table 1: Site Delivery

First 5 years					6-10 years				
19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29
PP	RM/DoC Sale	Start	45	65	65	65	65	65	30

Prematurity

5.32 It is acknowledged that the timing of this application would likely result in its determination shortly before the adoption of the emerging Local Plan 2030, a document that is currently at examination. For several reasons, however, it is not considered that this application is premature in the sense defined by either the NPPF and PPG and should instead be seen as a valuable source of housing that seeks to supplement both the immediate shortfall of supply and longer term issues in respect of the pipeline of residential land into the new plan period, as highlighted above.

5.33 Importantly, paragraph 49 of the NPPF clarifies the following:

"...in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in limited instances where both:

- a) The development proposal is so substantial, or its cumulative effect would be so significant, that to grant planning permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*
- b) The emerging plan is at an advanced stage but it not yet formally part of the development plan for the area."*

5.34 Taking account of the wording of the NPPF it is clear that the application scheme would not be considered premature on the basis of the following:

- Due to the acknowledged deficiencies in the Council’s housing land supply it is clear that this application would benefit from the presumption in favour of sustainable development described at paragraph 11 of the Framework. To this end paragraph 49 makes it clear that any argument in respect of prematurity will be particularly difficult to justify where the presumption applies;
- The application site lies on the edge of the Bedford urban area, a location considered as one of the most sustainable by the development strategy of the emerging Local Plan. To this end it would not be possible to argue that this application *"pre-determines decisions about scale, location or phasing of new development"* – indeed, it does in fact respond positively to the emerging spatial strategy of the Plan and accords with the approach taken in respect of the direction of sustainable growth; and
- In addition, it is not considered that the application scheme is *"so substantial"* that it would undermine the plan-making process. In the context of the emerging Local Plan the proposal would in fact

represent one of the Borough's smaller residential developments considering the presence of two significant sites in the urban area, 1,000 new homes at Stewartby and allocations for 500 new homes at four of the Borough's largest villages.

- 5.35 Paragraph 50 of the NPPF then clarifies that, in instances where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development would prejudice the outcome of the plan-making process. For the reasons set out above it is not considered that such grounds exists in that the application scheme in fact complements rather than conflicts with the emerging Local Plan, offering a supply of new homes that could and should come forward in parallel with the Council's preferred allocations.

Conclusions on Principle of Development

- 5.36 As a start point it is clear that the Council cannot currently demonstrate a sufficient 5-year supply of housing land, falling some way short at only 3.01-years' worth of supply. The application scheme would make an undisputable contribution to the immediate and pressing housing needs of the Borough. Allied with the sustainable location of the site and its compliance with the spatial approach to growth described by both the adopted and emerging local plans and it is clear that the principle of development is established.
- 5.37 Further justification for the release of the site now is provided by the identified shortfall in the 6-10 year period with the Council's housing trajectory provided as part of the evidence base of the emerging local plan forecasting an annual shortfall in delivery between 2026-30. Even in the event of the swift adoption of the plan and when assessed against the lower SHMA-based figure of 970dpa the number of homes anticipated over this period will result in the Council's projected supply dropping below five years as early as 2023/24. Based on the more contemporary housing requirement for the Borough, provided in the form of the government's current LHN figure of 1,345dpa, the predicted supply in the Borough beyond 2021 would fall significantly below this mark.
- 5.38 To this end, and irrespective of commitments made to undertake an immediate review of what is a clearly deficient emerging local plan, the Council also has an immediate duty incumbent on its development management function to ensure that the Borough's housing supply beyond the 5-year period is planned for in a sustainable fashion. This has been made clear by a number of well-publicised appeal decisions.
- 5.39 In respect of an appeal at Curborough in Lichfield¹¹ the Secretary of State decision letter concluded that:

"53. He attaches very substantial weight to the benefits of the provision of affordable and market housing. In doing so he considers that the appeal proposal advances the

¹¹ Appeal Ref: 2224354 - Watery Lane, Curborough, Lichfield, February 2017

social and economic roles identified in paragraphs 7 and 8 of the Framework (IR302) which are not diminished owing to the Council now being able to demonstrate a five year supply."

5.40 In respect of an appeal at Money Hill in North West Leicestershire¹² the Secretary of State concluded that:

"19. ...the appellant has not disputed the Council's contention that they have a five-year supply of housing land (IR87). However, the Secretary of State agrees with the Inspector that local planning authorities must also plan for housing beyond the five year period; that there is also a current national imperative to boost the supply of housing; and that, in recognition of this, the Council rightly does not cite their five year housing land supply as a reason to withhold planning permission (IR87). The Secretary of State attaches significant weight to the fact that the proposed development would provide for 605 new homes of which up to 182 would be affordable".

5.41 The shortfall in the 6-10 year supply is symptomatic of the short-term approach taken by the Council embodied by the preparation of an emerging local plan that effectively plans for a period of five years at best. This approach is recognised by a proposed policy commitment to review the plan almost immediately upon adoption. In the meantime, and in advance of a time-consuming root-and-branch review of the local plan, the application site is available now and is clearly capable of delivering a significant number of new homes quickly.

5.42 Taking all of the above into consideration paragraph 59 of the NPPF states that *"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed"*. The application scheme demonstrably helps the Council achieve this objective – to this end it is self-evident that it accords with Policy CP13 of the CSRIP that allows development to come forward in the open countryside if it accords with national policy. Similarly, it is clear that the development is capable of coming forward alongside other preferred housing sites identified within the emerging Plan, ensuring that it would not in any way be prejudicial to the Council's preferred strategy.

5.43 In addition, and due to the inability of the Council's current Growth Area-focused housing strategy to supply a sufficient number of new homes for the Borough, it should be concluded that there is a **clear need for additional dwellings to come forward now** on readily deliverable sites well-related to existing sustainable settlements. On this basis the application scheme accords with Policy CP14 which allows new development to come forward in the open countryside where there is *"a proven need for it to do so"*

Layout and Design

5.44 Whilst this application is in outline form only, with all matters relating to scale, appearance and layout

¹² Appeal Ref: 2228806 - Money Hill, Land North of Wood Street, Ashby-de-la-Zouch, February 2016

reserved, a significant amount of work has been put into identifying the opportunities and constraints that should guide the way in which the future development is delivered.

5.45 To this end this application is supported by a high-level Parameters Plan, prepared by RG+P, which provides a framework for the future detailed masterplan. Specifically, it identifies the location of the new school site, the developable area, the amount and type of open space to be provided on site along with its location and sets out the proposed points of vehicular access and how they will serve the scheme. This application is also supported by an extensive Design and Access Statement (DAS) that provides a thorough analysis of site constraints and explanation of the suggested design rationale.

5.46 The Parameters Plan provides the framework for a well-designed and medium-density residential development that would be characterised by substantial areas of open space, generous plot sizes, legible vehicular and pedestrian routes through the scheme and physical linkages with Salph End to the east and Bedford to the south. As described by the DAS and shown by the Parameters Plan the development would be delivered against several key design principles that specifically respond to some of the key constraints and influences identified by the suite of technical reports included with this application:

- The provision of the majority of the open space to be provided on the site on its western edge in accordance with the ambitions of Policy AD24 of the ADLP. This would serve a further purpose as an extensive and permanent landscape buffer between the developable area and the fringes of the Bedford urban area beyond. Whilst it is notable that the supporting Landscape and Visual Impact Assessment does not identify the likely coalescence of the western edge of Salph End with Bedford as an issue, nor indeed does the ADLP, this was set out as the single reason for the site's removal from the emerging Local Plan. To this end the orientation of the open space to the west of the site responds positively and proactively to the conclusions of the Council's own site assessment;
- The inclusion of a wide landscape and ecology corridor as part of this area of open space, essentially demarcating the westernmost extent of the developable area. This corridor would be provided for two reasons: firstly, to ensure that all development would take place away from the areas of the site more prone to surface water flooding; and secondly to provide the 9m easement required by the Lead Local Flood Authority to ensure unfettered maintenance of the watercourse;
- In respect of access, the site would be served by a single main 'spine' route that would connect two new junctions onto Ravensden Road to the north east and Hookhams Lane to the south east. This would be built to a standard to allow the efficient diversion of the existing bus route through the village;
- A surface water attenuation basin at the southern edge of the site, utilising the natural lie of the land sloping from north to south and allowing the eventual outfall of the collected water into the local watercourse at green field flow rates; and
- A 2.1ha site for a new 2FE primary school at the south eastern corner of the site. This location has

been chosen to ensure that the school has the ability to strengthen the existing core of the village and is orientated to ensure that the walking distance to the school for existing residents is minimised.

- 5.47 As is described in detail within the DAS the Parameters Plan, whilst high level, seeks to ensure that all of the key design requirements of the Council's 'Achieving Quality in Residential Layouts' SPG are capable of being accommodated by the development. It also acknowledges the need to accommodate the minimum levels of parking as described by the Council's 'Parking Standards for Sustainable Communities' SPD.

Landscape

- 5.48 This application is supported by a full Landscape and Visual Impact Assessment (LVIA) prepared by Aspect Landscape Planning. The LVIA seeks to assess the value of the site in the context of the surrounding landscape and identify both the magnitude of the impact of any development along with suggested mitigation. Importantly, in the context of issues previously raised in respect of coalescence, it also considers the site's visual relationship with both the village of Salph End and the Bedford urban area.

Landscape Setting

- 5.49 The site is not within the Green Belt or covered by any designations associated with landscape quality or value although it is noted that the linear western field (to the west of the brook) is covered by Policy AD24 of the ADLP 'Green Infrastructure Network Opportunity Zone: Bedford Northern Fringes', forming part of a proposed wider green infrastructure network. Overall it is considered that the site does not represent a "*valued landscape*" in relation to paragraph 170 of the NPPF.
- 5.50 The site sits in the context of the more formal open space to the south and west comprising the playing fields of Mark Rutherford School and Mowsbury Golf Course respectively. The south east boundary of the site then sits hard against the built edge of Salph End. Overall, the site is well contained by established vegetation, which is generally consistent and in healthy condition.
- 5.51 Whilst the key environmental constraint identified in relation to the site during the course of the Local Plan promotion relates to potential coalescence of Salph End and the northern edge of the Bedford urban area it is understood that these concerns more related to the parcel of land to the east of the village that, whilst subject of the previous promotion, now no longer comprises part of the application site. Regardless, the matter of coalescence has still been considered in depth both within the assessment of visual and character impact as well as in respect of the design response.

Design Response

- 5.52 The proposals have been developed to ensure that a carefully considered and sensitive, landscape-led approach is achieved. The Parameters Plan has been informed by the immediate context, localised settlement pattern and existing vegetation within the Site. The proposed layout would adopt a positive, outward looking approach, ensuring that the appearance of the development turning its back on the wider setting is avoided.
- 5.53 Importantly the Parameters Plan shows the location of the majority of the open space on site towards its western boundary, ensuring that the visual separation between the development and the northern edge of Bedford is maximised.
- 5.54 Internally, incidental green spaces and tree planting within proposed street scenes would add a further green element to the proposals, creating a sense of place and an attractive settlement for residents. Incidental open spaces within the development would also assist in breaking up the perceived built environment and provide opportunities for feature planting that would contribute to placemaking. These measures can be secured at reserved matters stage.
- 5.55 Retention of mature trees and hedgerows at the site boundaries are ensured, in particular along the Ravensden Road frontage (eastern boundary), adjacent to Mowsbury Golf Course (western boundary) and the watercourse (internal) to ensure a vegetated approach from Renhold village and the wider footpath network is maintained and enhanced. Boundary treatments would then also include retention and reinforcement of the existing native hedgerow planting to maintain the boundary to the site and contribute positively to local biodiversity. Careful specification of planting would ensure year-round visual and ecological interest.
- 5.56 One of the key principals of the development is the inclusion of a new school within the south eastern corner of the Site. This has been carefully considered and located within a central position, in relation to both the existing and proposed settlement area. The school would be partially located within the setting of its own extensive open space and within easy access to the proposed central primary road within the development and Hookhams Lane, which provides the main transport route through the existing settlement area.

Conclusions on Landscape and Visual Impact

- 5.57 The LVIA concludes that, whilst the application scheme would inevitably have a localised visual impact immediately adjacent to the site, otherwise the landscape is capable of accepting a significant level of well-designed residential development that would largely be read in the context of the existing built form

at Salph End and Bedford. Coalescence, both physical and perceived, would be avoided through the retention of existing mature boundary screening and the location of large areas of open space towards the western edge of the site. Otherwise, it is concluded that the landscape generally is not demonstrably special and therefore has the potential to accept change.

- 5.58 To this end, and in respect of landscape and character impact in particular, the application scheme complies with Policies NE4, NE6, NE12, NE13 and BE38 of the Local Plan 2002, Policies CP2 and CP24 of the CSRIP and Policy AD24 of the ADLP along with the relevant section of the NPPF.

Ecology

- 5.59 A Preliminary Ecological Appraisal (PEA) of the application site has been undertaken by Aspect Ecology, a copy of which is provided in support of this application. The PEA reviewed both on-site and off-site floral and faunal habitats and concludes with a scheme of proposed mitigation that seeks to not only preserve any existing habitats but also provide a net biodiversity gain as part of the proposed development.

On-Site Habitats and Species

- 5.60 No identified statutory or non-statutory ecological designations are present within any part of the site, nor immediately adjacent to the site. The habitats that are present within the site provide few opportunities for faunal species, being dominated largely by open, intensively managed arable land, albeit the field boundary vegetation and associated features provide some potential for use by common nesting birds, Badger and bats in particular. It is, however, recognised that the various expanses of hedgerow fringing the site are of local ecological importance and should be retained. Otherwise, the preliminary survey work did not identify the presence of any protected species within the site itself.

Off-Site Habitats and Species

- 5.61 The nearest statutory designation to the site is Putnoe Wood Local Nature Reserve (LNR), which is located approximately 0.3km west of the site. As a County Wildlife Site, this is also the nearest non-statutory designation. Putnoe Wood is connected to the western part of the site via footpath and bridleway links with a walking distance of approximately 0.5km (0.6km to the closest proposed residential area). It is, however, too distant to suffer any impact as a result of the development. Otherwise, the preliminary survey work did identify that there may be suitable habitats in the local vicinity to support Great Crested Newts, Badgers and Bats.

Conclusions on Ecology

5.62 Due to the lack of any designated or non-designated habitats on site, nor the presence of any protected species, no additional survey work beyond the PEA was undertaken in advance of the submission of this application. The PEA does, however, recommend a number of compensatory measures to be included as part of any detailed scheme of development that will maintain the habitats of species which exist locally and result in the ecological enhancement of the site. These are:

- The retention and protection of all hedgerows and mature woodland around the periphery of the site;
- The careful placement of any new lighting so as not to impact on local bat activity;
- Habitat compensation for foraging Great Crested Newts across the site;
- The inclusion of wildflower meadows, new hedgerow planting and wetland features on site where appropriate; and
- The creation of new 'hard' habitats through the inclusion of bat and bird boxes and log piles capable of supporting Invertebrates.

5.63 Otherwise, it is concluded that the site has a low level of ecological sensitivity and any impact of its development in principle can be mitigated at detailed design stage. To this end the application scheme is in accordance with the relevant parts of Policies NE4, NE6 and NE10 of the Local Plan 2002 and Policies CP2 and CP25 of the CSRIP. In addition, it accords with the general requirements of the NPPF in respect of securing net gains in biodiversity on new development sites.

Trees

5.64 A full Arboricultural Impact Assessment (AIA) of the site has been undertaken by Aspect Arboriculture. Whilst the site is largely devoid of trees due to it comprising two large agricultural fields there are a limited number of trees that would be impacted on by the application scheme. In particular there are a number of Tree Preservation Orders (TPOs) relating to specimens at the north east, north west and south east corners of the site, albeit they comprise areas of the landscaped boundary of the site which would not only be retained but where appropriate strengthened.

5.65 There are two new accesses proposed, one adjacent to the eastern boundary off Ravensden Road and one adjacent to the southern boundary off Hookhams Lane, which would require the demolition of No.25 Hookhams Lane. Tree removals necessary to accommodate the propose accesses are detailed within the AIA focusing on the clearance of two sections of low-quality field boundary hedgerow and the removal of low-quality ornamental fruit trees and shrubs from the private amenity space associated with No. 25 Hookhams Lane. Otherwise it is intended that all trees on site are capable of being retained.

- 5.66 The proposed Parameters Plan has been informed by a survey of the existing tree stock, and a review of relevant policy tests. Based on this plan, the arboricultural impact of the proposed development is expected to be minor and limited to the clearance of the specimens referred to above. No high or moderate quality trees, or trees scheduled within TPO 01/1956, TPO 02/1967 or TPO 22/1993, are expected to be harmed to accommodate the development. It would be possible to mitigate for the removals required to for the proposed accesses with the provision of appropriate replacement tree and hedgerow planting both around the periphery of and indeed across the site.
- 5.67 On this basis the application scheme is in full accordance with Policies NE4, NE6, NE12 and NE13 of the Local Plan 2002 in that it seeks to retain key trees both on and off-site whilst similarly ensuring that the most prominent specimens are incorporated as landscape features.

Heritage

- 5.68 This application is accompanied by a Heritage Statement, prepared by Asset Heritage, that considers the implications of any development on any heritage assets present in the locality.
- 5.69 Importantly, in its own right the application site has no intrinsic heritage significance (with the possible exception of any archaeological interest it might be found to possess) and cannot be considered as a non-designated heritage asset and material planning consideration in its own right. It is generally well-screened and separated from nearby listed buildings.
- 5.70 Despite the relative proximity of the site to the Grade II listed Abbey Farmhouse and No.s 27-35 Ravensden Road to the east these buildings do not rely in any way on the site, in forming part of their wider physical setting, to contribute to or better reveal their significance. The inter-visibility between the site and the respective listed buildings is very limited and, where present, does not represent or otherwise illustrate any meaningful relationship.
- 5.71 While the application is in outline only and there is therefore no detailed layout plan at this stage it is made clear in the accompanying Heritage Statement that the proposed development of the site has little, if any, potential to have any harmful impact on heritage assets. This is because of the lack of a meaningful or significant contribution made by the site to the setting of nearby listed buildings, and the general lack of inter-visibility between these and the site.
- 5.72 Based on the conclusions set out in the Heritage Statement and summarised above the application scheme would accord with Policy BE21 of the Local Plan 2002, Policy CP23 of the CSRIP and the tests set out in Section 16 of the NPPF.

Archaeology

- 5.73 A comprehensive archaeological desk-based assessment has been prepared by MOLA in support of this application. Whilst the report identifies that the application site lies within 500m of a local scheduled ancient monument (Mowsbury Hillfort) it is concluded that it is unlikely to contain any significant remains below ground.
- 5.74 Specifically, an assessment of the available sources suggests that the site has only a limited potential to contain Iron Age, medieval and post-medieval remains and even then, these are only expected to relate to previous agricultural use of the land. Whilst there is evidence that the surrounding area was likely settled during the Iron Age (for example the presence of Mowsbury Hillfort to the north-west and a potential Iron Age or Roman settlement to the north-east) it is considered unlikely that remains linked to either of these will be present on the site. These known settlements lie at a higher elevation than the proposed development site, which occupies lower-lying land between them. The likelihood of any significant remains existing are also diminished by the intensive modern cultivation of the land.
- 5.75 To this end it is concluded that the site has no archaeological significance and there is no need for any intrusive investigative work on site prior to development as referred to be Policy BE24 of the Local Plan.

Housing Mix

- 5.76 The NPPF provides a strong emphasis on the delivery of balanced and mixed communities facilitated through the delivery of a range of house types, sizes and tenure to meet the needs of all households. The most up-to-date housing requirements for Bedford Borough in respect of mix and dwelling size are set out in the 2018 update to the Council's Strategic Housing Market Assessment (SHMA). In respect of affordable housing contributions both the adopted and emerging Local Plans require 30% of all units to be affordable in tenure.
- 5.77 On the basis of both the SHMA and the affordable housing requirements of the Borough the following indicative split in respect of both size and tenure is proposed across the site:

Table 2: Indicative Housing Mix

	Market	Affordable	Market	Affordable	Total
1-bed flat	3.4%	24.0%	10	29	39
2-bed flat	3.7%	12.5%	10	15	25
2-bed house	10.0%	26.5%	28	32	60
3-bed house	58.9%	27.5%	165	33	198
4-bed house	19.6%	7.8%	55	9	64
5+ bed house	4.4%	1.7%	12	2	14
Total	100%	100%	280	120	400

5.78 Due to the deficiencies in the Council’s housing land supply described earlier in this section a proposal which secures the mix and unit numbers set out above would be beneficial to all sectors of the community who may be struggling to upgrade, downsize or enter the housing market for the first time due to constrained supply. In addition, it represents a significant contribution to the affordable housing needs of the Borough, needs which neither the applicant nor the Local Plan Inspectors are fully convinced can be met on the draft allocations included in the Council’s emerging strategy.

5.79 In conclusion the application scheme would provide for a significant contribution towards the Borough’s housing needs through its ability to deliver an appropriate mix of units by way of size, type and tenure conducive to creation of a coherent and cohesive community. To this end the proposal is fully in line with all relevant national and local planning policy in respect of housing supply.

Open Space Provision

5.80 Policy AD28 of the ADLP requires all new housing development of a type likely to create a demand for open space to provide it in accordance with the most up to date open space standards relevant to the Borough. In this instance these standards are included in the Council’s adopted Open Space SPD which provides a means of calculating the level of need for each type of open space and recreation space based on average occupancy figures across the Borough.

5.81 Appendix 6 of the SPD then helpfully provides an interactive spreadsheet that allows the entry of the proposed dwelling mix that in turn provides the scale of requirement for each type of open space. The applicant has undertaken this exercise, based on the housing mix described earlier in this section. The resultant open space requirement is set out below.

Appendix 6 Policy AD28 Open Space Standards					
	Occupancy rates	Dwelling numbers	Total population	insert number of dwellings in column C	
1 bedroom	1.3	39	50.7		
2 bedroom	1.9	85	161.5		
3 bedroom	2.6	198	514.8		
4 bedroom	3.2	64	204.8		
5+ bedroom	3.7	14	51.8		
Total		0	984		

Type	ha/1000pop	Requirement in ha	Requirement in square metres	On site provision or financial contribution?	Dwellings threshold for on site provision
Outdoor sports space	1.12	1.10	11016	financial contribution	250
Equipped/natural play areas (excludes 1 bedroom and elderly accommodation)	0.25	0.23	2332	on-site	35 but 20 if a local deficiency in the area
Allotments	0.35	0.34	3443	no provision/financial contribution	500
informal and amenity green space	0.5	0.49	4918	in front of property	10 on site or if between 5 and 9, provide as wider grass verges
accessible natural greenspace	0.5	0.49	4918	no provision/financial contribution	200
parks and gardens	0.5	0.49	4918	no provision/financial contribution	250

- 5.82 In accordance with the requirements of Policy AD28 the standards set out above are not only met by the proposed development but in most instances exceeded. In total 3.14ha of open space is required with 6.13ha provided (including the corridor of publicly accessible land following the route of the stream running across the site). A detailed breakdown of this provision is included at **Plan 2** of this Statement and in the key of the Parameters Plan submitted in support of this application.
- 5.83 It is also important to confirm that the proposals seek to take the opportunities identified at Policy AD24 of the ADLP through the improvement of the provision of public open space within the northern fringes of Bedford – the majority of the open space is located on the western edge of the site identified as part of the green network to the north of Bedford. In addition, it seeks to further the objectives of Policies NE11 and LR10 of the Local Plan 2002 and Policy AD36 of the ADLP in respect of enhancing footpath and cycle links to the countryside along with enhancements and the extension of the local public footpath network within the confines of the site.

Highways and Access

- 5.84 This application is accompanied by a full Transport Assessment (TA) and Residential Travel Plan (RTP) prepared by MAC Consulting. Together these documents seek to demonstrate that the application scheme avoids any severe impact on the local highways network whilst encouraging the use of sustainable transport modes wherever possible.

Vehicular Movement

- 5.85 On the basis of an upper level of development on the site of 400 new dwellings along with a 2FE primary school the TA provided in support of this application predicts the following number of trips at the AM and PM peaks:

Table 5.5: Vehicle Trip Numbers

Use	Morning Peak (0800-0900)			Afternoon Peak (1700-1800)		
	Arr	Dep	Total	Arr	Dep	Total
Dwellings	66	262	328	200	88	289
School	136	103	239	11	16	26
Total	213	409	622	245	119	364

- 5.86 Based on these figures it is anticipated that there may be residual impact on highways movement at six junctions locally, including the two new junctions to be created at the site. The only junction where it is identified that there will be a significant impact on overall capacity is the Norse Road / Goldington Road / St Neots Road junction on the eastern edge of the Bedford urban area. To this end a series of nil-

detriment works are proposed within the TA that can be secured by way of an appropriately worded legal agreement.

Site and Internal Access

- 5.87 The application scheme would principally be accessed from Hookhams Land following the demolition of No. 25 Hookhams Lane with a secondary access provided off Ravensden Road at the northern end of the site. Drawings of the proposed access arrangements are included in the appendices of the accompanying TA. Both provide sufficient visibility when the speed limits of the receiving highway network are taken into consideration.
- 5.88 A spine road, with a width of 6.0m, would connect both accesses making this a suitable route for use by buses. This would be accompanied by a 3m-wide shared footway and cycleway along this central route through the site. Other adoptable roads within the development site would be constructed in line with the current design standards but would typically comprise a 5.5m wide carriageway with a 2m-wide footway either side in the instance that a shared surface is not deployed.

Car and Cycle Parking

- 5.89 Parking within the development, the location and orientation of which would be confirmed as part of the reserved matters submission, would be provided in line with the Council’s current parking SPD. It is understood that the relevant standards for cars are as follows:

Dwelling Size	Parking Space Requirement	Cycle Parking Requirement
1-3 bedrooms	Minimum 2 space (excluding garages)	1 secure covered space per bedroom
4 or more bedrooms	Minimum 3 spaces (excluding garages)	1 secure covered space per bedroom

Conclusions on Highways and Access

- 5.90 It is demonstrated within the accompanying highways technical reports that the application scheme would provide not only a scheme of access that is safe in the context of the local road environment but also one that would have a minimal impact the function of the highway network generally. A junction analysis of the impact of development has been undertaken which shows that the impact of development on traffic flow is insignificant. In addition, parking can be delivered at the prescribed Borough standards whilst the scheme seeks to provide sufficient infrastructure across the site to accommodate and encourage the use of sustainable modes of transport. To this end the application scheme is entirely in accordance with Policies T4, T6, T15 and BE30 of the Local Plan 2002, Policies AD36 and AD39 of the ADLP and, in

particular, paragraph 109 of the NPPF.

Air Quality

- 5.91 This application is accompanied by an Air Quality Assessment (AQA) prepared by Redmore Environmental. The AQA identifies that during the construction phase of the development there is the potential for air quality impacts as a result of fugitive dust emissions from the site. Assuming good practice dust control measures are implemented, the residual significance of potential air quality impacts from dust generated by earthworks, construction and trackout activities was predicted to be not significant. These effects can be controlled by way of a Construction Management Plan, to be secured by condition.
- 5.92 Potential impacts during the operational phase of the proposals may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. A review of the dispersion modelling undertaken indicates that impacts on annual mean NO₂ and PM₁₀ concentrations as a result of traffic generated by the development were predicted to be negligible at all sensitive receptor locations.
- 5.93 To this end there would be no adverse impact on either existing or future residents in respect of air quality.

Noise

- 5.94 Due to the potential location of new homes within close vicinity of the existing highways network, along with the construction of a new vehicular access between Nos 23 and 27 Hookhams Lane, this application is supported by a full acoustic assessment of these noise sources, prepared by Professional Consulting.
- 5.95 In respect of road noise on future residents located at the northern end of the site, closest to Ravensden Road, it is identified that any noise impact could be mitigated through the simple inclusion of standard thermal double glazing in the design of new dwellings accompanied by alternative means of ventilation. An acoustic fence of 1.7m would then ensure an acceptable level of amenity in the associated residential gardens. In terms of any impact on the residents of Nos. 23 and 27 Hookhams Land this can once again be mitigated – in this instance through the erection of a further 1.7m acoustic fence.
- 5.96 In summary it can be concluded that the application scheme does not present any threat to the amenity of either existing or future residents through exposure to road noise.

Flooding and Drainage

- 5.97 This application is accompanied by a Flood Risk Assessment (FRA) and drainage strategy prepared by

MAC Consulting.

Flood Risk

- 5.98 The Site lies entirely within Flood Zone 1, which is classified as having a low probability of flooding and is suitable for all types of development. Consideration has been given to any potential for flooding from rivers or the sea, groundwater, sewers or reservoirs and this has confirmed a low probability of flooding from these sources. Investigations have further confirmed that the site has no record of flooding.

Surface Water Drainage

- 5.99 The application site has areas of high, medium and low surface water flooding. It is not proposed to locate any new development in the high and medium surface water flood risk areas (as demonstrated by the parameters plan). Whilst some development is proposed within the low risk areas the finished floor levels of all new homes in these zones would be raised some 300mm above existing ground level and the layout would be designed to accommodate the north to south overland flow routes during an extreme flooding event.
- 5.100 In terms of the surface water drainage scheme it is designed to include a system of piped drains, detention basins and cellular paving that combined would ensure that greenfield equivalent run-off rates are achieved. Any run-off would continue to have an eventual outfall into the local watercourse.

Foul Water Drainage

- 5.101 Foul water would be discharged into the adopted sewer located at Hookhams Lane.

Conclusions on Flood Risk and Drainage

- 5.102 The application site generally is prone to low levels of flood risk although more regular instances of surface water flooding can be expected in the vicinity of the brook crossing the site. In response the application scheme incorporates a developable area that avoids the parts of the site most prone to flooding and a system of drainage that ensures that the development would not exacerbate flooding downstream. To this end the application is in accordance with Policy NE16 of the Local Plan 2002 and Policy CP2 of the CSRIP.

Utilities

- 5.103 An Incoming Services Appraisal has been prepared by MAC Consulting in support of this application. It

demonstrates that due to the location of the application site in close proximity to both Salph End and the Bedford urban area connections are readily available to all mains utilities, including broadband.

Ground Conditions

- 5.104 A Ground Investigation Report, prepared by Geo-Environmental Consultants, is included in support of this application. Specifically, it identifies the suitability of the ground for construction as well as any contamination sources that may be present.
- 5.105 In short it is identified that there is a very low risk of contamination, including ground gas, due to the long-term use of the site as an agricultural field. In addition, it is not considered that there are any issues in respect of ground stability.

Local Infrastructure

- 5.106 One of the key benefits of the application scheme is its ability to provide enhancements to local transport and community infrastructure.
- 5.107 In terms of direct contributions towards the sustainability of Salph End and the northern fringes of Bedford the site will include improvements to the local highway network facilitating improved public transport links, a significant level of new informal and formal open space (detailed earlier in this section) as well as a parcel of land reserved to accommodate a new 2FE 420-pupil primary school.
- 5.108 Firstly, the site would include a central spine road that would allow bus services to provide direct links through the site and ensure that residents have to walk only minimal distances to access services. It is anticipated that the introduction of 400 new homes at Salph End would necessitate the upgrade of the regular services to and from the village which currently are limited.
- 5.109 The school site has been included in recognition of the Council's approach highlighted during the course of the production of the new Local Plan, where Officers have sought new education facilities as part of all new large-scale residential developments. The new school would provide sufficient space for not only the pupils generated by the application scheme (predicted to be approximately 129 children) but also additional capacity in the local school system as a whole.
- 5.110 The most recent figures provided on the Government's own website show that two of the closest primary schools to the application site, Goldington Green Academy and Renhold VC Primary School, are 173 and 29 pupils over capacity whilst Putnoe Primary School is only currently offering capacity for an additional

46 pupils by way of compensation¹³.

- 5.111 In addition, it is anticipated that further contributions would be sought towards community facilities and services such as health care, libraries and public realm. These would be negotiated on an item-by-item basis during the course of the application. Lastly, it is estimated that the application scheme would attract approximately £2.4 million of contributions as a result of the Council's Community Infrastructure Levy, around £350,000 of which will be payable to Renhold Parish Council.
- 5.112 On the basis of the significant contribution to local infrastructure proposed as part of the application scheme it is clear that it fully accords with Policy BE3 of the Local Plan 2002 and Policy CP30 of the CSRIP.

Planning Balance

- 5.113 Taking all of the above matters into account it should be concluded that on balance the benefits of this application outweigh any adverse impacts. Principally, the balance is significantly tipped in favour of the application scheme due to the sizeable contribution the scheme would make to the housing supply of the NRDA.
- 5.114 In line with paragraph 12 of the NPPF "*local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed*". Whilst the location of this application falls within the open countryside and departs from the policies of the development plan, it represents an instance where there is a clear undersupply of houses across the Borough, both in the short term and perhaps more pressingly in the medium to long term, that would remain unmet unless action is taken.
- 5.115 In summary the application scheme demonstrates a high level of sustainability and would contribute positively towards the following objectives:

Economic:

- Support for, and improvement of, a range of local services and amenities; and
- Benefits to the local construction jobs market and economy through the delivery of a significant number of homes and supporting infrastructure.
- Increase in consumer spending at local businesses and services as a result of population increase;

¹³ <https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/139523>
<https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/139519>
<https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/109603>

Social:

- Delivery of up to 400 much needed new dwellings that would contribute significantly and positively towards local housing needs;
- Specifically, the delivery of up to 280 market dwellings across a range of sizes and house types;
- In addition, the delivery of up to 120 affordable dwellings (30% of all dwellings on site) across a range of sizes and house types;
- The delivery of a new community in a demonstrably sustainable location adjacent to the Bedford urban area and in walking distance of a full range of shops, services and amenities;
- Beneficial contribution to housing land supply in the 0-5 year period where there currently exists a shortfall and in the 6-10 year period where the emerging plan makes insufficient provision;
- Upgrades to the local footpath network and public transport facilities;
- Provision of a site for a new 2FE primary school that would not only provide school places for the future residents of the scheme but would also complement the network of primary schools in the vicinity of the site that are predominantly operating at capacity and generate direct employment opportunities; and
- Provision of a generous level of on-site open space and recreational facilities that would help create a high standard of amenity for future residents and provide for the health and well-being of both existing and future residents.

Environmental:

- A net gain in biodiversity through both the retention and improvement of the most valuable habitats on site and the opportunity to provide an ecological corridor along the route of the stream;
- The orientation of the developable area of the site away from the Bedford urban area to ensure any prospects of coalescence are entirely avoided;
- The delivery of a new residential development in a highly sustainable location in walking and cycling distance of a full range of shops, services and amenities thus encouraging a modal shift away from private car;
- The delivery of a high-quality scheme that is capable of incorporating the highest standards of design, along with significant areas of open space and landscaping; and
- A comprehensive drainage scheme that would ensure any issues with existing surface water can be rectified and future surface water run-off mitigated.

5.116 On the basis that the Council's housing land supply is chronically deficient it is clear that there are significant sustainability benefits which weigh heavily in favour of the application scheme and ensure that the presumption in favour of sustainable development should apply.

6.0 SUMMARY AND CONCLUSIONS

- 6.1 This Statement, along with the substantial suite of supporting information provided as part of this application, demonstrates that the proposed development for up to 400 dwellings alongside the delivery of land for a new 2FE primary school, enhanced pedestrian access and public open space would be sustainable in every respect. Furthermore, the rigorous assessment of the site by Officers during the Local Plan process has allowed the applicant to gain a clear understanding of how the application site is capable of accommodating a residential development that responds successfully to its constraints, particularly in respect of its landscape setting.
- 6.2 The site was previously included as part of a new urban extension in an early draft of the emerging Local Plan, a decision which demonstrates the sustainability credentials of the site. Whilst it was then removed from a later draft of the plan it was done on grounds that can now be appropriately responded to – namely character impact and coalescence.
- 6.3 Despite the location of the site within the open countryside, and a limited level of conflict with the adopted development plan, the principle of a sustainable development on the site is established by the Council's current inability to demonstrate a sufficient supply of housing land. This is then strengthened when the worrying drop-off in delivery over the 6-10 year period of the emerging Local Plan is taken into account. The application scheme would make a significant contribution towards both the Borough's 0-5 and 6-10 year supply periods.
- 6.4 Otherwise, all of the key constraints identified at the site can be overcome. The proposal would form a well-designed extension to Salph End on a site which is well-related to the Bedford urban area. It would benefit from nearby access to a full range of shops, services and facilities present within both Salph End and the northern extent of the Bedford urban area. In addition, the site would accommodate the delivery of a new 2FE primary school and provide a generous level of informal and formal open space all of which would benefit existing local residents and new residents of the application scheme alike.
- 6.5 On the basis of the above it is concluded that the application scheme represents development that is sustainable in every respect and, in accordance with paragraph 11 of the NPPF, should be approved without delay.

APPENDIX 1:

Consultation Leaflet issued to all properties in Salph End – 4th September 2019



Notification of a planning application on land at Salph End



Manor Oak Homes will shortly be submitting an outline planning application on land at Salph End for up to 400 new homes, land for a new two form-of-entry primary school and a generous amount of open space including sports pitches. The site was previously identified by Bedford Borough Council as representing an appropriate, sustainable and deliverable site for development in an early draft of the emerging Local Plan.

This application will respond to the need for new homes in Bedford Borough as the Council cannot demonstrate the required supply for the next 5-years—it is estimated that only 75% of the 6,725 dwellings required may be delivered. In addition, the Council's housing requirement is due to increase by over a third in the near future.

In addition to the provision of new housing—30% of which will be affordable—the proposal offers a wide range of community benefits, all of which are clearly set out in the information provided in support of the application. Access to the full suite of documents comprising the application will be available on both the Bedford Borough Council and Manor Oak Homes websites shortly (www.manoroakhomes.co.uk/bed-042).

Otherwise, an extract of the proposed Illustrative Masterplan is provided on the reverse of this leaflet.

It is proposed to submit the planning application to Bedford Borough Council by mid-September 2019.

Manor Oak Homes would be pleased to hear your views on their proposals. You can provide comments to us directly by emailing them to info@arplanning.co.uk or sending them by post to Armstrong Rigg Planning, The Exchange, Colworth Science Park, Sharnbrook, MK44 1LZ referencing "Salph End".